

EXHIBIT C

**Robbins Geller
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December 16, 2022

VIA EMAIL

Matthew A. Chiricosta
Fritz E. Berckmueller
Calfee, Halter & Griswold LLP
The Calfee Building
1405 East Sixth Street
Cleveland, Ohio 44114-1607

mchiricosta@calfee.com
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Re: *In re FirstEnergy Corp. Securities Litigation*
No. 2:20-cv-03785-ALM-KAJ (S.D. Ohio)
Partners for Progress Subpoenas

Dear Matt and Fritz:

Pursuant to the Court's November 18, 2022 Order, on behalf of Plaintiffs and Mr. Dowling, we write to raise our objections to the production made in response to the Order. And of course we reject your reference to "harassing aims" of the discovery requests. Indeed, as set forth by Judge Jolson, the requested discovery from PFP is necessary for resolving issues in this litigation, and the issues themselves are of central importance to the litigation. Further, PFP was at the heart of the scheme that comprises part of Plaintiffs' allegations.

First, as discussed in Mr. Favret's December 14 email, we specifically object to the following:

- The failure to produce a complete supplemental privilege log;
- The failure to produce Dan McCarthy's PFP documents;
- The failure to search Calfee custodians who worked on PFP matters; and
- The use of certain overly-narrow search terms to identify relevant materials.

Second, we also continue to object to the over-designation of documents as privileged and intend to present the issue for Court resolution.

Third, we request the following search terms be added:

- FirstEnergy OR "First Energy" OR "FEC" OR "FES" OR "Energy Harbor"

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- *@firstenergycorp.com
- PFP OR “P4P”
- “IEU Oh*”
- Pappas
- “Gen* Now” OR “GN”
- “jefflongstreth@gmail.com”
- anna /3 lippincott
- “alippincott21@gmail.com”
- (“G&O” OR “G+O”) AND (fund OR PAC OR organization)
- “the Coalition”
- “hard working ohio*”
- loparo OR “lo paro” OR Carlo
- Oxley
- “Grant St*”
- batchelder
- “*thebatchco.com”
- Sam
- “randazzo.samuel@gmail.com”
- “randazzosc@gmail.com”
- “randazzosc@yahoo.com”
- “sam@mcneeslaw.com”
- “sam@mwncmh.com”
- “sam@sustain-ohio.com”

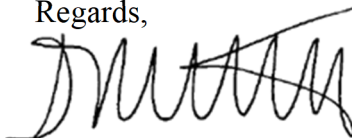
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December 16, 2022
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- “Samuel.randazzo@puco.ohio.gov”
- “srandazzo@mwncmh.com”
- “sustainability funding alliance” OR SFA OR SFS OR SFAO OR “*sutain-ohio.com”
- (PUCO OR “public utilities commission”) /25 nominat*
- OFES OR OES
- Asim OR Haque
- Rafeld
- Dowling
- “baileyfes@gmail.com”
- Bailey /3 Joel
- Biltz
- DPA OR “deferred prosecution”
- “the Speaker” OR “speaker of the house”

Please let us know some times to meet and confer next week, as we believe the Court expects us to work through as many of our issues as possible prior to submitting our supplemental briefing.

Regards,



DAVID W. MITCHELL

DWM:tdv

cc: John A. Favret (*via email*)
John F. McCaffrey (*via email*)
Kevin S. Sciarani (*via email*)